

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

JOE ALEXANDER,

Plaintiff,

v.

**DIET MADISON AVENUE, JEAN
BATTHANY, DANI HURT, MARA BUTA,
ADWEEK, LLC, AND PATRICK COFFEE,**

Defendants.

Case No. 3:19-cv-00688-JAG

ADWEEK DEFENDANTS' MOTION TO DISMISS

Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), Local Civil Rule 7, and, to the extent Virginia law applies, the immunity provided by Virginia Code § 8.01-223.2, Defendants Adweek, LLC and Patrick Coffee (collectively, “Adweek”), by and through undersigned counsel, move this Court for an Order dismissing this action for the reasons set forth in the accompanying Memorandum of Law.

WHEREFORE, Adweek respectfully requests that the Court grant this Motion and enter an Order dismissing this action.

MEET AND CONFER CERTIFICATION

Pursuant to Local Civil Rule 7(E), undersigned counsel hereby certify that counsel for Adweek met and conferred telephonically with counsel for Plaintiff Joe Alexander on November 19, 2019 and by email on December 17 and 18, 2019. Counsel for Plaintiff advised that Plaintiff was unwilling to withdraw the Amended Complaint or any of its claims.

Dated: December 20, 2019

Respectfully submitted,

BALLARD SPAHR LLP

By /s/ Matthew E. Kelley

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